

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MEMPHIS A. PHILLIP RANDOLPH
INSTITUTE, et al.,

Plaintiffs,

v.

TRE HARGETT, et al.,

Defendants.

Civil No. 3:20-cv-00374

**JOINT MOTION TO HOLD GREENE COUNTY ELECTION COMMISSION'S
SECOND MOTION TO QUASH IN ABEYANCE**

On April 8, Counsel for the non-party Greene County Election Commission (the “Commission”) and Counsel for Plaintiffs held a meet-and-confer in which each party to this motion agreed to work towards a resolution on the subpoena duces tecum received by the Commission from the Plaintiffs on or about March 12. The Commission and Plaintiffs now appear through counsel and jointly request the Court to hold in abeyance the Commission’s Motion to Quash Plaintiffs’ subpoena pending further developments.

If the Commission and Plaintiffs are able to resolve the objections raised by the Commission in its Motion and satisfy the requests made through the subpoena duces tecum, the Second Motion to Quash will be moot, and each party to the motion will notify the Court

accordingly. If the Commission and Plaintiffs are unable to resolve the objections, the parties will jointly notify the Court, the Commission will renew its Second Motion to Quash, and Plaintiffs shall request, with no objection by the Commission, two weeks from the date of renewal to file their response in opposition.

April 12, 2021

By: /s/ William L. Harbison

William L. Harbison
SHERRARD, ROE, VOIGT & HARBISON
150 3rd Ave. South, Ste. 1100
Nashville, TN 37201
(615) 742-4200
bharbison@srvhlaw.com

Ezra D. Rosenberg
Pooja Chaudhuri
LAWYERS' COMMITTEE FOR CIVIL
RIGHTS UNDER LAW
1500 K Street NW, Ste. 900
Washington, DC 20005
(202) 662-8600
erosenberg@lawyerscommittee.org
pchaudhuri@lawyerscommittee.org

Danielle Lang
Jonathan Diaz
Molly Danahy
Caleb Jackson
CAMPAIGN LEGAL CENTER
1101 14th St. NW, Ste. 400
Washington, DC 20005
(202) 736-2200
dlang@campaignlegalcenter.org
jdiaz@campaignlegalcenter.org
mdanahy@campaignlegalcenter.org
cjackson@campaignlegalcenter.org

By: /s/ Benjamin K. Lauderback

Benjamin K. Lauderback
BPR No. 020855
WATSON, ROACH, BATSON, &
LAUDERBACK, P.L.C.
1500 Riverview Tower
900 South Gay Street
P.O. Box 131
Knoxville, Tennessee
37901-0131

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Joint Motion to Hold Greene County Election Commission's Second Motion to Quash in Abeyance was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

Janet M. Kleinfelter
Andrew B. Campbell
Alexander S. Rieger
Matthew D. Cloutier
Tennessee Attorney General's Office
P.O. Box 20207
Nashville, Tennessee 37202

John L. Ryder
Harris, Shelton, Hanover & Walsh, PLLC
One Commerce Square
Suite 2700
Memphis, Tennessee 38103-2555

Dated this 12th day of April, 2021.

By: /s/ William L. Harbison
WILLIAM L. HARBISON